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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products
Liability Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' CONSENT MOTION
FOR REDACTION REQUEST
DEADLINE EXTENSION AND DATE
CERTAIN FOR SEALING TRIAL
EXHIBITS IN JONES MDL CASE**

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard") hereby respectfully move this Court, with Plaintiffs' consent, for an additional extension of the redaction request deadlines by 30 days and to set a date certain for motions addressing the confidentiality of exhibits admitted into evidence during the *Jones v. Bard* trial. Bard requests, and Plaintiffs consent to this extension based on Bard's pending Motion for Reconsideration of the Order regarding the corresponding motion for redaction and to seal in *Booker v. Bard*. [Dkt. 11766].

The current redaction request deadline is July 30, 2018. [Dkt. Nos. 11797]. Bard

1 requests that the Court extend the deadline by 30 days to August 30, 2018. Bard does not
 2 anticipate requesting that much, if any, of the trial transcript be redacted.¹ However, Bard
 3 believes that this revised deadline will be more efficient for the parties and the Court in
 4 addressing the voluminous trial exhibits at issue.

5 RESPECTFULLY SUBMITTED this 30th day of July, 2018.

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 7 /s/ Richard B. North, Jr.

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 28 ¹ Bard assumes that Ms. Jones will seek to redact portions of the transcript relating to her medical care.

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2018, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

s/ Richard B. North, Jr.

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